

November 10, 2004 (Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC U. S. Environmental Protection Agency c/o Crab Orchard National Wildlife Refuge 8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq. Associate Regional Counsel 77 West Jackson Boulevard (C-14J) Chicago, IL 60604-3590

Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
Monthly Report; October 1 - October 31, 2004 Reporting Period

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting and covers the period from October 1 to October 31 2004.

Sincerely.

Steven D. Smith Project Coordinator

cc: Nabil Fayoumi – USEPA Region 5

Sandra Bron - IEPA Mike Coffey - USFW Richard Williams - Solutia Cathleen Bumb - Solutia

Mayor Frank Bergman - Cahokia

Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)

Mayor R. Sauget - Sauget, IL L. Glen Kurowski- Monsanto Linda Tape - Husch & Eppenberger

EPA Region 5 Records Ctr.

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO - Dead Creek Sediment Removal Action

Status Report

Date of Report:

November 10, 2004

Period Covered:

October 1, 2004 - October 31, 2004

Work Performed During the Reporting Period

Groundwater Monitoring

• Revision 01 of the Draft Groundwater Monitoring Plan was submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, the plan has been implemented.

TSCA Containment Cell

- The Operations and Maintenance Report submitted for the Agencies' review and approval on August 28, 2001- remain under review. Portions of the Plan applicable to the placement of sediments have already been approved.
- Performed inspections of the site.
- Inspected and maintained the 6 oz. geotextile/6 mil scrim reinforced poly cover over the containment cell.
- Maintained stormwater and leachate collection controls around the containment cell.
- Monitored support area facilities.
- Third quarter samples of the groundwater monitoring wells around the cell are being analyzed.

Dead Creek

At a meeting held on April 20, 2004, the U.S. EPA requested a conceptual plan for completion of the removal of the bottom soils in Dead Creek. That plan was to be based on soil removal in Creek Sectors F and D and, if sufficient room exists in the containment cell, excavation of portions in Creek Sector B. The plan was submitted to the Agencies on May 17, 2004. Conditional approval for removal of additional soils from Creek Sectors F, D, and B and for construction of the final cover on the sediment containment cell was received in a letter dated September 14, 2004. The letter also approved the

installation of a liner in Creek Sector B, provided the U.S. EPA separately approves the design of the liner system. A schedule for implementation of the work was submitted to the US EPA on September 30, 2004 and was approved on October 11, 2004.

A contract was awarded to Philip Services Corporation (PSC) of Columbia, Illinois to perform the creek dewatering work. PSC completed mobilization by the end of October and will start pumping water from Creek Sectors B and F early in November.

The existing pumping system in Dead Creek has kept Creek Sector D dry. Consequently, creek bottom soil sampling was completed in this sector by the end of the reporting period. These samples were sent to the laboratory for PCB analyses and sample splits were also submitted for immunoassay screening. Sampling in the bottom of Creek Sector F will not be possible until the water in this stretch of the creek has been pumped down.

A meeting was held with the Agencies and with the State and County Highway Departments to discuss road and drainage improvement works that the County intends to construct on Judith Lane in 2005. It is likely that the lining of Creek Sector B will be completed by the time that the road and drainage works commence. Consequently, it was agreed to provide the County with details of the lining system design by the first week of December. This will allow the County to include these details in their bid documents, in the expectation that the road work contractor will have to restore the lining at the culvert locations on the upstream side of Judith Lane. Between 70 and 90 cubic yards of soil from the creek will be excavated to permit culvert extensions to be constructed by the County. The Highway Department will be responsible for staking out the excavation locations and grades and the excavated material will be placed in the TSCA containment cell on Judith Lane.

Data Submittal

No data are submitted with this report.

Work Scheduled for Next Reporting Period

- Conduct routine inspection of the containment cell.
- Continue operation of the stormwater treatment system.
- Perform necessary operation and maintenance on the containment cell and temporary treatment system.
- Complete analyses of third quarter 2004 groundwater samples from monitoring wells.
- Validate analytical data from soil samples in Creek Sector D.
- Pump down Creek Sectors B and F.
- Sample creek bottom soils in Creek Sector F.
- Finalize the designs for the lining in Creek Sector B.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0%
Final Report Preparation	0 %